TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 12, 2016

Mr. Danny Doyle
F.J. Salvage
(b) (6)
Leonard, Texas 75452

Re: TCEQ Notice of Deficiency (NOD) to the following documents:
- *Affected Property Assessment Report*, received October 13, 2015
- *Response to TCEQ letter dated November 16, 2015*, dated December 16, 2015 *(submitted via email from Mr. Danny Doyle to the TCEQ on 12/16/2015)*

Former F. J. Doyle Salvage Transformers property located at (b) (6)
(b) (6)(905 N. Poplar Street), Leonard (Fannin County), TX;
TCEQ SWR No. 80951; EPA ID No. TXD980865109; Customer No. CN600359095;
Regulated Entity No. RN100649227

Dear Mr. Doyle:

The Texas Commission on Environmental Quality (TCEQ) is in receipt of your *Affected Property Assessment Report* (APAR) for the above referenced property. The APAR was submitted to document the assessment of contamination associated with the property on-site and to areas off-site in accordance with the requirements of 30 Texas Administrative Code (TAC) 350. The TCEQ is also in receipt of an email submitted to the TCEQ from Mr. Danny Doyle on December 16, 2015, in response to TCEQ comment letter dated November 16, 2015. The November 16, 2015 comment letter was issued in response to TCEQ review of a Unit Closure Request and Facility Registration Inactivation Request, dated May 27, 2015. The APAR (received October 13, 2015) and May 27, 2015 were also submitted in response to TCEQ letter dated March 30, 2015, requesting a remediation status update of the waste management unit closure report and issues related to the assessment and cleanup of contamination associated with the facility.

Based on our review, the October 13, 2015 APAR does not provide adequate information to document compliance with the affected property assessment requirements of 30 TAC 350.51. In addition, the December 16, 2015 response does not provide the TCEQ's requested response (i.e. *Amended Closure Report for WMU No. 001 and 002*) to support the closure of the units or request for inactivation of the industrial solid waste registration (SWR) associated with the site. As such, the TCEQ cannot approve the APAR or the December 16, 2015 response regarding the closure of WMU No. 001 and 002/inactivation of the SWR at this time. A list of the deficiencies to the above referenced documents is enclosed. Please submit a *Revised APAR* to address the enclosed deficiencies associated with the October 13, 2015 submittal. In addition, the TCEQ continues to require the submittal of the *Amended Closure Report* for WMU No. 001 and 002 as previously instructed in TCEQ's November 16, 2015 letter (as per the enclosed comments).

An original and one copy of the *Revised APAR* for the referenced property and *Amended Closure Report for WMU No. 001 and 002* must be submitted to the TCEQ Remediation

Division at the letterhead address using mail code number MC-127. An additional copy of each document should be submitted to the TCEQ Region 4 Office in Dallas/Fort Worth. The *Amended Closure Report for WMU No. 001 and 002* is required to be submitted **within thirty (30) days of the date of this letter.** The *Revised APAR* must be prepared and submitted to the TCEQ for review **within 120 days from the date of this letter.** *As a reminder, failure to submit and/or implement the required WMU Closure and TRRP assessment/cleanup actions to address the contamination associated with the property within the schedule set by the TCEQ is violation of agency regulation and potentially subject to enforcement actions under Chapter 7 of the Texas Water Code.*

Please call me at (512) 239-6542 if you need additional information or wish to discuss these comments or the due dates. Thank you for your cooperation in this matter.

Sincerely,

Eleanor T. Wehner, P.G.
Sr. Project Manager
VCP-CA Section
Remediation Division
Texas Commission on Environmental Quality

ETW/mdh

Enclosures: TCEQ Comments to *Affected Property Assessment Report*, received October 13, 2015

TCEQ Comments to *Response to TCEQ letter dated November 16, 2015*, dated December 16, 2015 (submitted via email from Mr. Danny Doyle to the TCEQ on 12/16/2015)

cc: Mr. James Sales, USEPA Region 6, 1445 Ross Avenue, Suite 1200, Mail Code: 6MM, Dallas, TX 75202-2733

(b) (6) Leonard, TX 75452

Mr. Sam Barrett, Waste Section Manager, TCEQ Region 4 Office, Dallas/Fort Worth

TCEQ letter dated January 12, 2016
ENCLOSURES
TCEQ SWR No. 80951

TCEQ Comments to *Affected Property Assessment Report*, received October 13, 2015

Based on our review of the *Affected Property Assessment Report,* received October 13, 2015, the TCEQ requires the submittal of a *Revised APAR* to address the following deficiencies:

Section 1 (Conclusions and Recommendations): The APAR suggests the future planned used of the on-site portion of the property may be a parking lot for Leonard ISD. As this facility is currently considered a commercial/industrial property as defined in TRRP (and likely zoned as such), *please note the applicability of residential land use restrictions applicable to educational facilities for properties conducting assessment/cleanup pursuant to the Texas Risk Reduction Program (TRRP) rules (30 TAC 350).*

1. Section 1.2: The APAR provides a summary of a site reconnaissance and physical observations of the property conducted by representatives of Terra-Solve in November of 2009. However, based on TCEQ's review of the text and supporting photographs associated with the 2009 site reconnaissance, areas of hydrocarbon contamination, unconfirmed presence of liquids in various storage tanks/containers, a parts washer, various containers of chemicals, debris, parts, etc. were identified on the property and the supporting photographs suggest an overall lack of property management and environmental housekeeping concerns associated with the property.

   As several years has passed, the APAR is noted to lack an overall assessment of *current* environmental conditions associated with the property. The APAR should be amended to provide an updated site reconnaissance completed by a qualified environmental professional to verify current site conditions, assess current and future risk of release of contaminants associated with the property and determine areas warranting additional investigation/release verification to satisfy the source area characterization requirements of TRRP [i.e., 30 TAC 350.51(a) and (b)]. A determination of the overall physical security of the site should also be performed to ensure the site is adequately protected with regard to potential risk posed contaminants on the property to potential trespassers on the property. As the TCEQ understands the site is inactive, removal and proper disposal of existing chemicals, chemical storage containers, drums, parts washer, tanks, etc.) should also be implemented and appropriately documented (proper removal and disposal). Please provide post removal inspection and photographic documentation by a qualified environmental professional to support the removal/disposal activities and copies of supporting legal records (e.g., receipts, waste manifests, bill of lading, etc.) documenting the proper disposal of materials transported off-site.

2. Section 2.1 and Section 5-Groundwater Assessment: An active public supply well was identified within 500 feet of the property. As such, the TCEQ will require verification of the presence/absence of groundwater contamination associated with the property in order to confirm whether the soil contamination identified or suspected to have been associated with site activities (i.e., petroleum hydrocarbons, solvents, PCBs and RCRA metals) has migrated to the uppermost water bearing unit. The TCEQ recommends the installation and sampling of a minimum of one (1) upgradient and three (3) downgradient monitor wells in the uppermost water bearing unit to initially determine if groundwater is impacted with contaminants identified or suspected to have been associated with site activities (i.e., petroleum hydrocarbons, solvents, PCBs and RCRA metals) and also to verify potentiometric flow conditions in the uppermost saturated zone. Based on the analytical results of the assessment, please note that additional groundwater assessment may be required to satisfy

the lateral and vertical assessment requirements of 30 TAC 350.51(c) and (e), respectively.

In addition, please note that if initially reporting a case of groundwater contamination to the TCEQ, the TCEQ requires the concurrent submittal of a *Drinking Water Survey Report* (DWSR), as a stand-alone document. The TCEQ uses the report primarily to comply with Texas Water Code (TWC), Section 26.408. Section requires the TCEQ, within 30 days of the date the TCEQ receives notice or otherwise becomes aware of groundwater contamination, to notify owners and users of private drinking water wells that may be affected by the groundwater contamination (i.e., groundwater ingestion standards exceeded). Additional information regarding the preparation and submittal fo the DWSR and requirements of TWC Section 26.408 may be obtained at the TCEQ website at: https://www.tceq.texas.gov/remediation/twc26_408.html.

Please amend the applicable sections of the APAR to provide the supporting information documenting the results of the groundwater assessment activities (i.e., Section 2, 3, 5, and supporting appendices) and, if required, the stand alone DWSR.

3. Section 2.2 (Field Receptor Survey): The APAR must be amended to provide supporting information documenting the performance of the required 500-ft field receptor survey. Refer to Section 2.2 of the APAR instructions for clarification of the specific documentation required to be presented in the APAR.

4. Section 2.6 (Exposure Pathways): The text of the APAR is noted to convey information as to the stability/persistence of contaminants in specific media of concern (i.e., soil, sediment, air, etc.) in response to specific soil conditions; however, the APAR lacks supporting information documentation the behavior of contaminants specific to conditions at the site (e.g., site specific soil pH evaluation, site-specific leachate analytical results, etc.).

5. Section 2.5 (Groundwater Resource Classification): The APAR lacks the completion of a groundwater resource classification (Class 1, 2, or 3) of the uppermost saturated zone(s), potentially affected groundwater-bearing units, etc. Please refer to Section 2.5 of the instructions of the APAR form to properly address this issue.

6. Section 2, Attachment 2A (Tier 1 Ecological Exclusion Criteria Checklist): The APAR lacks the completion of the required Tier 1 Ecological Exclusion Criteria Checklist. Please refer to Section 2, Attachment 2A of the instructions of the APAR form to properly address this issue.

7. Section 3.2 (Assessment Strategy): All information provided in the APAR presents a summary of existing sampling performed in the 1990s and information based on a site reconnaissance conducted on November 20, 2009, as part of a Phase I Environmental Site Assessment. Although the prior areas subject to analytical sampling have been incorporated into the APAR as historic analytical data relevant to the assessment of the site, the areas previously sampled should be considered for re-assessment to confirm current levels of concentrations to support evaluation of proposed remedial actions. Please note that the collection and analysis of additional environmental samples will be required to document conformance with the analytical data usability requirements specific to the TRRP regulations applicable to assessment/response actions associated with the site. Please refer to RG-366/TRRP-13 (Review and Reporting of COC Concentration Data under TRRP), Revised May 2010 for additional guidance regarding this topic. This document can be obtained on the TCEQ's website at: *http://www.tceq.state.tx.us/remediation/trrp/guidance.html*.

8. APAR Executive Summary (tables for Assessment, and Remedy Decision), Conclusions/Recommendations, and Appendix 1 (Notifications): The APAR indicates

impacts of contamination issues associated with the property extend to off-site properties. Please note 30 TAC 350.55 (Notification Requirements) of the TRRP regulations require specific notification requirements applicable to off-site property owners during assessment/cleanup activities performed in accordance with 30 TAC 350 (TRRP). Concurrence of any proposed response action proposals related to the cleanup of off-site contamination issues must be obtained from applicable off-site property owners prior to implementation. In addition, proof of compliance with the requirements of 30 TAC 350.55(d) and/or (e) must be submitted to the TCEQ certifying the required notifications have been completed within the specified number of calendar days of the date the notices are due. Supporting documentation demonstrating compliance with the notification requirements of 30 TAC 350.55 should be captured in Appendix 1 of the APAR form.

9. Section 4 (Soil Assessment):

- Based on our review, the APAR does not provide a sufficient soil assessment demonstrating compliance with the lateral and vertical extent delineation requirements of 30 TAC 350.51(c) and (d) of TRRP, respectively, with respect to petroleum hydrocarbons, solvents, PCBs and RCRA metals. The APAR must also be amended to document assessment and demonstrate conformance to the federal requirements of 40 CFR 761, Subpart N with respect to PCBs, in particular. [The TCEQ also previously noted the extent delineation issues in comment 1 and 2 of a prior letter issued June 18, 2010 (copy of TCEQ letter provided as an attachment to the APAR)]. The APAR must be amended to provide information verifying the lateral and vertical extent delineation requirements with respect to petroleum hydrocarbons, solvents, PCBs and RCRA metals to document compliance with 30 TAC 350.51(c) and (d) of TRRP and 40 CFR 761, as applicable to PCBs.
- The APAR lacks sufficient assessment/characterization of all potential source areas of contamination on the property. The APAR must be amended to provide additional investigation and characterization of all potential source areas on the property and surface water drainage ditches with respect to petroleum hydrocarbons, solvents, PCBs and RCRA metals to document compliance with 30 TAC 350.51(b) of TRRP.
- The APAR notes that surface water runoff from the property is noted to have a potential to affect surface soils and drainage ditches (and potentially surface water) on-site and extending to off-site areas. TCEQ also indicated in comment 5 of a prior letter issued June 18, 2010, the need to demonstrate that drainage ditches are not impacting surface water (copy of TCEQ letter provided as an attachment to the APAR)]. The APAR must be amended to provide supporting assessment information to document the characterization, assessment and delineation of contamination of all media of concern (e.g., soil, sediment, surface water, etc.) present in drainage ditches on-site and extending to off-site areas with respect to petroleum hydrocarbons, solvents, PCBs and RCRA metals.

For future reference, starting January 1, 2016, the TCEQ Remediation Division requires the use of United States Environmental Protection Agency (USEPA) SW846 Method 5035A, Purge-and-Trap and Extraction for Volatile Organics in Soil and Waste Samples, as amended, for the collection and preparation of solid samples for volatile organic compound (VOC) analysis using purge-and-trap technology. The TCEQ Remediation Division guidance on Method 5035 has been updated and is available at the TCEQ's website at: https://www.tceq.texas.gov/assets/public/remediation/tceq-rem-guidance-for-epa-method-5035.pdf. In addition, please be aware that the TCEQ's Tier 1 Protective

TCEQ letter dated January 12, 2016
ENCLOSURES
TCEQ SWR No. 80951

Concentration Levels (PCLs) and supporting tables have been revised December 2015. The most current tables can be obtained from the TCEQ's website at: http://www.tceq.state.tx.us/remediation/trrp/trrppcls.html. Please ensure the most current TCEQ PCLs are being used for comparative purposes.

TCEQ letter dated January 12, 2016
ENCLOSURES
TCEQ SWR No. 80951

TCEQ Comments to *Response to TCEQ letter dated November 16, 2015,* dated December 16, 2015 *(submitted via email from Mr. Danny Doyle to the TCEQ on 12/16/2015)*

1. The TCEQ continues to lack adequate information to document achievement of closure of registered waste management units (WMU) and industrial solid waste registration (SWR) associated with the property (SWR No. 80951). Although a unit closure request was previously submitted by representatives of F.J. Doyle to the TCEQ as recently as May 27, 2015, information documenting the regulatory closure of WMU No. 001 and 002 in accordance with the requirements of 30 TAC 335.8 continues to remain outstanding.

   Comments regarding TCEQ review of the May 27, 2015 WMU closure request were previously conveyed to representatives of F.J. Salvage on November 16, 2015. The TCEQ's November 16, 2015 letter required the submittal of an *Amended Closure Report for WMU No. 001 and 002* to the TCEQ for technical review within forty-five (45) days of the TCEQ's letter. Although the TCEQ acknowledges receipt of an email on December 16, 2015 from Mr. Danny Doyle in response to the TCEQ's November 16, 2015 letter, the email response did not provide the *Amended Closure Report* nor did the response provide a path forward/schedule for submittal of the *Amended Closure Report*. The amended report is required to document the closure of WMU No. 001 and 002 in accordance with the 30 TAC 335.8 and support the SWR inactivation request for the property.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 16, 2015

Mr. Danny Doyle
F.J. Salvage
(b) (6)
Leonard, TX 75452

Re: TCEQ Comments to *Unit Closure Request and Facility Registration Inactivation Request*, dated May 27, 2015
Waste Management Unit No. 001, 002 and 003
Former F. J. Doyle Salvage Transformers property located at (b) (6)
(b) (6) (905 N. Poplar Street), Leonard (Fannin County), TX;
TCEQ SWR No. 80951; EPA ID No. TXD980865109; Customer No. CN600359095;
Regulated Entity No. RN100649227

Dear Mr. Doyle:

The Texas Commission on Environmental Quality (TCEQ) is in receipt of your unit closure and facility inactivation request dated May 27, 2015. The document was received at our office on October 21, 2015, and was submitted in response to TCEQ letter dated March 30, 2015, requesting a remediation status update of the waste management unit closure report and issues related to the assessment and cleanup of contamination associated with the facility. The TCEQ is also currently in receipt of an Affected Property Assessment Report (APAR) submitted by representatives of F.J. Salvage to document the assessment of contamination associated with the property on-site and to areas off-site in accordance with the requirements of 30 Texas Administrative Code (TAC) 350. *Please note the formal technical review of the APAR will be conducted by the TCEQ shortly.*

Based on our review, the May 27, 2015 request provides adequate information to support the closure of WMU No. 003 (Miscellaneous Storage Containers). *A copy of this letter has been forwarded to the TCEQ Registration and Reporting Section to update your Notice of Registration (NOR) to reflect the closure of WMU No. 003.* For questions regarding the NOR, please contact the Registration and Reporting Section at (512) 239-6413.

The TCEQ; however, requires the submittal of additional supporting information to document closure of the WMU No. 001 (Miscellaneous Storage Containers) and 002 (Thermal Processing Unit). Please provide the following additional information to support the closure of WMU No. 001 and 002:

1. WMU No. 001: The May 27, 2015 WMU closure report does not provides supporting documentation demonstrating the removal and proper disposal of the referenced 300 gallon container and 55 gallon drums associated with the unit. The TCEQ requires additional supporting information documenting the removal/disposal of all containers/drums associated with the unit. Please ensure the photographs capture views of the interior areas of the unit. The TCEQ also notes the presence of a total of 6-55 gallon drums shown in one of the pictures referenced in the May 27, 2015 report either

located within the concrete bermed area and also on pavement surrounding the bermed area. Please ensure all containers/drums either inside the bermed area of the unit or on the pavement adjacent to the unit have been properly removed and disposed. *Please provide post removal inspection and photographic documentation to support the removal/disposal activities and copies of supporting legal records (e.g., receipts, waste manifests, bill of lading, etc.) documenting the proper disposal of the containers/drums and any material currently stored within the containers/drums).*

2. WMU No. 002: The supporting photograph provided in the report apparently shows the floor where WMU No. 002 was previously located. The TCEQ requires additional supporting information documenting the location of the photograph with respect to physical surroundings within the building and specific details of the building construction specifications where the unit was previously located. *Please provide additional photographs showing the current conditions of the interior of the building in reference to the general location of the unit. In addition, please clarify what the floor of the building consists of and provide and provide a figure of the interior area of the building depicting the former location of the furnace in reference to the locations of your supporting photographs.*

Please submit an Amended Closure Report for WMU No. 001 and 002 addressing the above referenced comments to the TCEQ for technical review within forty-five (45) days of the date of this letter.

Questions concerning this letter should be directed to me at (512) 239-6542. When responding by mail, please submit an original and one copy of all correspondence and reports to the TCEQ Remediation Division at Mail Code MC-127 with an additional copy submitted to the local TCEQ Region Office.

Sincerely,

Eleanor T. Wehner

Eleanor T. Wehner, P.G.
Sr. Project Manager
VCP-CA Section
Remediation Division
Texas Commission on Environmental Quality

ETW/mdh

cc: (b) (6) Leonard, TX 75452
Mr. Sam Barrett, Waste Section Manager, TCEQ Region 4 Office, Dallas/Fort Worth

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 30, 2015

~~CERTIFIED MAIL~~

91 7199 9991 7033 2775 5188

Mr. Danny Doyle
F.J. Salvage
(b) (6)
Leonard, Texas 75452

Re: *Final Request for Remediation Status Update*
Waste Management Unit Closure Report and Contamination issues associated with the former F. J. Doyle Salvage Transformers property located at (b) (6)
(905 N. Poplar Street), Leonard (Fannin County), TX;
TCEQ SWR No. 80951; EPA ID No. TXD980865109; Customer No. CN600359095;
Regulated Entity No. RN100649227

Dear Mr. Doyle:

On January 26, 2007, the Texas Commission on Environmental Quality (TCEQ) issued a letter regarding required environmental corrective actions at the above referenced site. A second request for status update letter was also issued on September 5, 2008. Both letters referenced the need to submit a Closure Report for three (3) waste management units (WMU) listed on the above referenced registration pursuant to 30 Texas Administrative Code (TAC) 335.8. In order to close a WMU, the owner/operator must remove all waste from the WMU and demonstrate that a release from the WMU to the environment has not occurred. Additionally, the TCEQ letters provided directives requiring representatives of F.J. Salvage to assess the full nature and extent of identified contamination associated with the facility and implement required cleanup of the contamination in accordance with 30 TAC 350 of the Texas Risk Reduction Program (TRRP) rule. The TCEQ required the submittal of an Affected Property Assessment Report pursuant to 30 TAC 350.51 of TRRP to initially fully assess the contamination issues associated with the property. To date the TCEQ has not received any information or response to our letters indicating that the required actions have been implemented, performed or completed. The TCEQ has attached a copy of the TCEQ letter(s) dated January 26, 2007 and September 5, 2008 for your reference.

As owner of the above reference property, you are responsible for ensuring that documents and work are scheduled and completed within the prescribed time frames. Failure to submit and/or implement the required WMU Closure and TRRP assessment/cleanup actions to address the contamination associated with the property within the schedule set by the TCEQ is a violation of agency regulations and potentially subject to enforcement actions under Chapter 7 of the Texas Water Code. You are hereby directed to comply with all TCEQ corrective action directives and

subsequent requests previously referenced in TCEQ letter(s) dated January 26, 2007 and September 5, 2008. **Please provide a response providing a status update, schedule and workplan for submittal of the required APAR to assess the contamination associated with the property and the required Closure Report for the three waste management units associated with TCEQ Solid Waste Registration 80951 within thirty (30) days of the date of the letter.**

Failure to submit this information within thirty (30) days of the date of the letter is a violation of TCEQ regulations and may result in issuance of a Notice of Violation (NOV). Failure to comply with any of these deadlines can potentially result in a Notice of Enforcement and an Enforcement Action Referral.

An original and one copy of the above referenced response must be submitted to the TCEQ Remediation Division at the letterhead address using Mail Code MC-127. An additional copy should be submitted to the TCEQ Region 4 Office in Dallas/Fort Worth located at 2309 Gravel Drive, Fort Worth, TX 76118-6951. Your response must be submitted within thirty (30) days from the date of this letter. The facility name, location and identification number(s) in the TCEQ reference line above should be included in your response. Questions concerning this letter should be directed to me at (512) 239-6542.

Sincerely,

Eleanor T. Wehner

Eleanor T. Wehner, P.G.
Sr. Project Manager
VCP-CA Section
Remediation Division
Texas Commission on Environmental Quality

ETW/mdh

Enclosure(s): TCEQ letter directives issued to representatives of F. J. Salvage on January 26, 2007 and September 5, 2008

cc: Mr. James Sales, Regional PCB Coordinator, EPA Region 6, 1445 Ross Avenue, Suite 1200, Mail Code: 6PD, Dallas, TX 75202-2733

Mr. Sam Barrett, Waste Section Manager, TCEQ Region 4 Office, Dallas/Fort Worth

SSchrei

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 5, 2008

CERTIFIED MAIL
91 7108 2133 3935 1880 9979

Mr. Danny Doyle
F. J. Doyle Salvage
(b) (6)
Leonard, Texas 75452

Re: **Second Request for Remediation Status Update**
F. J. Doyle Salvage Transformers, TCEQ SWR No. 80951

Dear Mr. Doyle:

The Texas Commission on Environmental Quality (TCEQ) has conducted a review of our Central Records file to determine the status of environmental activities associated with the above referenced site. According to our file review, the TCEQ's letter dated January 26, 2007, requested submittal of a Unit Closure Report and an Affected Property Assessment Report. Based on our review, the TCEQ has not received either of these requested documents. The TCEQ has attached a copy of the TCEQ letter dated January 26, 2008 for your reference.

The F. J. Doyle Salvage Transformers facility is advised that failure to comply with all TCEQ corrective action directives and subsequent requests, including the specified time frames, may result in the initiation of formal enforcement action by the TCEQ. **The requested Unit Closure Report and Affected Property Assessment Report must be provided within fifteen (15) days of the date of this letter.**

An original and one copy of the above referenced response must be submitted to the TCEQ Remediation Division at the letterhead address using Mail Code MC-127. An additional copy should be submitted to the TCEQ Region 4 Office in Fort Worth, Texas. The facility name, location and identification number(s) in the TCEQ reference line above should be included in your response. Questions concerning this letter should be directed to me at (512) 239-5454.

Sincerely,

Sarah A. Schreier, P. G., Project Manager
Team 1, Environmental Cleanup Section II
Remediation Division

SAS/jhm

Enclosure: TCEQ's letter to Mr. Danny Doyle dated January 26, 2007

cc: Waste Program Manager, TCEQ Region 4 Office, Fort Worth, Texas
Mr. Danny Doyle , F. J. Doyle Salvage, P. O. Box 312, Leonard, Texas 75452-0312

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 26, 2007

Mr. Danny Doyle
F. J. Doyle Salvage
P. O. Box 312
Leonard, Texas 75452-0312

Re: Unit Closure Request and Assessment Request
F. J. Doyle Salvage Transformers
SWR No. 80951

Dear Mr. Doyle:

The Texas Commission on Environmental Quality (TCEQ) has received your letter dated 23 October 2006 in response to our 14 July 2006 letter requesting a Unit Closure Report for three Waste Management Units still listed as active at the F. J. Doyle Salvage Transformers facility at 305 E. Cottonwood, Leonard, TX 75425. In your response, you requested additional clarification of what information needed to be submitted to the TCEQ. Specifically, you asked for clarification on what a waste management unit was, and indicated that you needed some guidance on where to find a Notice of Registration number.

Generally, a waste management unit is any area where waste is placed. Examples of waste management units include surface impoundments; waste piles; land treatment areas; landfill cells; incinerators; tanks and their associated piping and underlying containment system; and container storage areas. A container alone is not a waste management unit; the unit includes containers and the land or pad upon which they are placed.

For your reference I have attached a report containing Notice of Registration information relevant to this facility. Page 3 of the report describes what waste management units are listed as "active" at this location. Page 2 describes the wastes that were stored or managed in each waste management unit. My phone number and email are in the last paragraph of this letter; *please* contact me if you have questions about this attachment.

The Notice of Registration number is simply a reference number used assigned to each unit at a facility for ease of reference. It is typically a three digit number found on the far left of the unit description in the Notice of Registration (see page 3 of the attached report). In this case your waste management unit Notice of Registration numbers are: 001 for various storage containers on a concrete pad, 002 for the thermal process unit, and 003 for the dumpster.

Dallas/Fort Worth Office at 2309 Gravel Drive, Fort Worth, Texas, 76118-6951. Your response must be received on or before May 31, 2007. The facility name, location and identification number(s) in the reference line of this letter should be included in your response.

Please contact me at (512)239-5454, or email at sschreie@tceq.state.tx.us if you need any additional information or clarification, or if you wish to discuss the due date. I look forward to speaking with you in the near future.

Sincerely,

Sarah A. Schreier, P. G., Project Manager
Team 1, Environmental Cleanup Section 2
Remediation Division
Texas Commission on Environmental

SS/cjh

Enclosure(s): Enclosure 1 – Notice of Registration
Enclosure 2 – Health Consultation, Doyle Transformer Site, Leonard, Texas, Fannin County (June 29, 2000)

cc: Mr. Danny Doyle, (b) (6) Leonard, TX 75452
Waste Program Manager, TCEQ Region 4 Office, Dallas/Fort Worth

*** Texas Commission on Environmental Quality ***
Notice of Registration
Industrial and Hazardous Waste

Date: 03/26/2015

)51 F J DOYLE

lid Waste Registration #: 80951 EPA ID:TXD980865109 CN: CN600359095 RN: RN100649227

mpany Name: F J DOYLE SALVAGE .ANSFORMERS Region: 4 Initial Registration Date: 07/21/1993

te Name: F J DOYLE County: 147 FANNIN Last Amendment Date: 04/24/2006

te Location: (b) (6) :ONARD, TX Land Type: PRIVATE Last Update Date: 04/27/2006

imary Contact: DOYLE, F J Title: ENVIRONMENTAL MANAGER

ailing Address: PO BOX 312 Phone:903-587-3342
LEONARD, TX, 75452-0312

egistration Status: CLOSURE REQUEST HW Permit: IW Permit: MW Permit:

.egistration Type: GENERATOR,TRANSPORTER

lazardous Waste Generation Type:

ransporter Business Type: Transport own waste only

ransport Waste Class: 1

Jniversal Waste Activity:

Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more):

Destination Facility for Universal Waste:

NAICS Code:

Tax ID: 0

80951 F J DOYLE

Owner Information

Name: F J DOYLE SALVAGE TRANSFORMERS,

Phone: 903-587-3342

Address: PO BOX 312

LEONARD, TX, 75452-0312

Operator Information

Billing Contact:

Title:

As of 04/24/2006 -

The next unassigned sequence number for WASTES is 0004.

The next unassigned sequence number for UNITS is 004.

80951 F J DOYLE

**** WASTE INFORMATION ****

Texas Waste Code	Waste Class	Status	Waste Status Code Change Date	Mixed Radioactive	TCEQ Audit Complete	Waste Update Date	Inactive Reason
****** Active Wastes ******							
00012061	1	Active		N	No	9/8/11	

Waste Description: Used oil from non-PCB Transformers being scrapped out for salvage; initial generation: 1/86
Date of Generation: 7/27/93

Texas Form Code: 206 - Waste oil

EPA Hazardous Waste Numbers: None
Current Management Units: 22 - Miscellaneous Storage Containers: 001, OFF-SITE
Origin Codes: 3 - Derived from on-site management of a nonhazardous waste
NAICS Code:
New Chemical Substance: N

00023041	1	Active		N	No	9/8/11	

Waste Description: Ash residue from furnace used to remove varnish from copper wire; initial generation: 1/86
Date of Generation: 7/27/93

Texas Form Code: 304 - Other 'dry' ash, slag or thermal residue

EPA Hazardous Waste Numbers: None
Current Management Units: 08 - Thermal Processing Unit, other than Incinerator: 002, OFF-SITE
Origin Codes: 3 - Derived from on-site management of a nonhazardous waste
NAICS Code:
New Chemical Substance: N

00039012	2	Active		N	No	9/8/11	

80951 F J DOYLE

Texas Waste Code	Waste Class	Status	Waste Status Code Change Date	Mixed Radioactive	TCEQ Audit Complete	Waste Update Date	Inactive Reason
****** Active Wastes ******							

Waste Description: General plant refuse from office and shop
Date of Generation: 7/27/93

Texas Form Code: 901 - Plant production refuse

EPA Hazardous Waste Numbers: None
Current Management Units: 22 - Miscellaneous Storage Containers: 003, OFF-SITE
Origin Codes: 1 - Generated on-site from a product process or service activity
NAICS Code:
New Chemical Substance: N

Texas Waste Code	Waste Class	Status	Waste Status Code Change Date	Mixed Radioactive	TCEQ Audit Complete	Waste Update Date	Inactive Reason
** No Longer Generated Wastes **							

80951 F J DOYLE

**** UNITS AT THIS SITE MANAGING WASTE ****

WMU Sequence Number	Unit Capacity	Capacity UOM	Unit Status	Date of Unit Regis	Class of Waste from Offsite	UIC Permit Number	Unit Number on Permit	Unit Update Date	Deed Record Date
** 'Active', 'Closure Pending' & 'Closure Request' Units **									
001			CLOSURE REQUEST	4/24/06				9/14/11	

Unit Type: Miscellaneous Storage Containers
Unit Regulatory Status: 05 Non-Hazardous Regulated
Unit Description: Various storage containers 1 x375 gallon, 2 x 500 gallon and 55 gallon drums. Stored on concrete pad
Billing Class:
System Type Cd: 141 Storage

Wastes Currently Managed in Unit: 00012061 Used oil from non-PC
Wastes Previously Managed in Unit: None

002			CLOSURE REQUEST	4/24/06				9/14/11	

Unit Type: Thermal Processing Unit, other than Incinerator
Unit Regulatory Status: 05 Non-Hazardous Regulated
Unit Description: High temperature oven to burn varnish off copper
Billing Class:
System Type Cd: 010 Metals recovery including retorting, smelting, chemical, etc.

Wastes Currently Managed in Unit: 00023041 Ash residue from fur
Wastes Previously Managed in Unit: None

003			CLOSURE REQUEST	4/24/06				9/14/1	

00039012 2 Active

951 F J DOYLE

MU Sequence Number	Unit Capacity	Capacity UOM	Unit Status	Date of Unit Regis	Class of Waste from Offsite	UIC Permit Number	Unit Number on Permit	Unit Update Date	Deed Record Date
'Active', 'Closure Pending' & 'Closure Request' Units **									

Unit Type: Miscellaneous Storage Containers

Unit Regulatory Status: 05 Non-Hazardous Regulated

Unit Description: Dumpster, 4 yd for accumulation of plant trash

Billing Class:

System Type Cd: 141 Storage

Wastes Currently Managed in Unit: 00039012 General plant refuse

Wastes Previously Managed in Unit: None

MU Sequence Number	Unit Capacity	Capacity UOM	Unit Status	Date of Unit Regis	Class of Waste from Offsite	UIC Permit Number	Unit Number on Permit	Unit Update Date	Deed Record Date
'Inactive', 'Closed', 'Post Closure Care', 'Never Built' & 'Not Required' Units **									

U uence nber	Unit Capacity	Capacity UOM	Unit Status	Date of Unit Regis	Class of Waste from Offsite	UIC Permit Number	Unit Number on Permit	Unit Update Date	Deed Record Date
Not Yet Built' & 'Under Construction' Units **									

Enclosure 2

Health Consultation, Doyle Transformer Site, Leonard, Texas, Fannin County (June 29, 2000)

Doyle Transformer Site Consultation

BACKGROUND AND STATEMENT OF ISSUES

The Texas Natural Resource Conservation Commission (TNRCC) requested that the Texas Department of Health (TDH) evaluate the potential health risks associated with exposure to polychlorinated biphenyls (PCBs) in soil on and near the Frank J. Doyle Transformer site in Leonard, Fannin County, Texas. The site consists of approximately one-half acre surrounded by a six-foot wooden fence and is an active registered salvage yard that receives and processes used power transmission transformers for recoverable metals [1]. Polychlorinated biphenyls were widely used as coolants in transformers before they were banned in 1977 [2]. There is conflicting information as to whether transformers still are being processed on the site.

The site is bordered to the north by a residential area, to the east by Leonard High School, to the south by an alleyway and a residence, and to the west by the owner's residence. The alleyway is used infrequently and is covered by a layer of gravel. A day care center, which contains has outside play areas for children, is located southwest of the site across the alley.

As a result of residential concerns regarding exposures to PCBs in 1995 and in 1998, the Environmental Protection Agency (EPA) and TNRCC collected soil samples on and around the facility. Samples were collected on the site, in the Doyle residential yard adjacent to the site, in the alleyway, in the residential yard south of the site, in drainage ditches downgradient of the site, in the day care center yard, and in the high school yard (Table 1, Figure 1).

Surface-soil samples (0-6") from the residential yard south of the site and from the owner's residential yard contained maximum PCB concentrations of 27.9 milligrams-PCB/kilogram-soil (mg/kg) and 85 mg/kg, respectively. The maximum concentrations of PCBs in surface-soil samples from all other locations off-site ranged from non-detectable to 5.7 mg/kg. Three on-site surface soil samples contained 2.0 to 10.4 mg PCB/kg soil. Sub-surface soil samples (6-24") revealed elevated levels of PCBs on the site (maximum 2,300 mg/kg), in the alleyway (maximum 4,100 mg/kg), and in the drainage ditches downgradient from the site (maximum 37.7 mg/kg) (Figure 1).

In addition to soil samples, three groundwater samples (and one duplicate) were collected from two city of Leonard municipal water wells and one privately owned drinking water well. Samples were analyzed for pesticides, polychlorinated biphenyls (PCBs), semi-volatile and volatile organic compounds, and metals. None of the groundwater samples contained significant quantities of pesticides, PCBs, semi-volatile and volatile organic chemicals or metals.

DISCUSSION

Health Assessment Comparison Values

In order to assess the potential health risks associated with soil exposure to a specific PCB, Aroclor 1260, we compared the reported concentrations to health assessment comparison (HAC) values for non-carcinogenic and carcinogenic endpoints (see toxicological evaluation section below). Currently, there are no HAC values specifically for Aroclor 1260 [3]; therefore, we based the non-cancer comparison value for Aroclor 1260 on the Agency for Toxic Substances and Disease Registry's (ATSDR's) minimal risk level (MRL) for the structurally similar compound Aroclor 1254. The MRL is an estimate of a daily human exposure to a contaminant that is unlikely to cause adverse non-cancer health effects over a lifetime. We based the cancer risk comparison value for Aroclor 1260 on the U.S. Environmental Protection Agency's (EPA's) cancer slope factor for PCBs as a class of chemicals and an estimated excess lifetime cancer risk of one-in-one million for persons exposed for 30 years.

Based on average soil ingestion rates of 100 mg/day for 70 kg adults and 200 mg/day for 15 kg children, HAC values for adults and children (14 mg/kg and 1.5 mg/kg) were exceeded in surface soil samples from both residences (Table 1). While exceeding a HAC value does not imply that the contaminant represents a public health threat, it does suggest that site-specific exposure evaluation of the contaminant warrants further consideration.

Polychlorinated Biphenyls (PCBs)

Background

PCBs are a group of synthetic organic chemicals that contain 209 individual chlorinated biphenyl compounds (known as congeners) with varying harmful effects. They are either oily liquids or solids and are colorless, odorless, and tasteless. There were seven common types of commercially available PCB mixtures, also known as "Aroclors," which constitute 98% of PCBs sold in the United States since 1970. The name Aroclor 1254 means that the molecule contains 12 carbon atoms (first two digits) and approximately 54% chlorine by weight (second two digits). The more highly chlorinated Aroclors have been found to have greater potential for adverse health effects in humans and animals. There are no known natural sources of PCBs in the environment. Typical concentrations in soil are less than 0.01 to 0.04 mg/kg [3].

Because they don't burn easily and are good insulating materials, PCBs have been used widely as coolants and lubricants in transformers, capacitors, and other electrical equipment. The manufacture of PCBs stopped in the United States in 1977 because of evidence that they build up in the environment and cause harmful health effects. Today, PCBs can be released into the environment from poorly maintained hazardous waste sites that process used electrical transformers or by burning of organic wastes in municipal and industrial incinerators.

Environmental Fate

PCBs released into the environment bind strongly to soil and sediments and may remain there for several years to many decades. Because of the strong adherence to soil, migration of the highly

Other effects observed in animals include increased hepatic microsomal enzyme induction, liver enlargement, fat deposition, fibrosis, and necrosis, increased cholesterol (animals), thyroid enlargement with decreased production of thyroid hormones, increased adrenal gland production reported as an adaptive response to stress, facial edema, acne, fingernail loss, loss of hair in monkeys, weight loss, and kidney damage. However, the levels necessary to produce those effects were very high and it is not known if the same effects would happen in people chronically exposed to lower levels [3].

Inhalation of PCBs by workers employed in capacitor facilities has been observed to cause upper respiratory tract or eye irritation, cough, headaches, and tightness of the chest. Hepatic effects, such as increased levels of serum liver-related enzymes may be related to inhalation of PCB particles [4].

Weak correlations between PCB exposure and depressed immunological function, specifically a reduction in natural killer (NK) cells, have been found in humans consuming PCB-contaminated fish; however, these studies are confounded by the coinciding presence of DDT, which also has been associated with affecting the immune system.

The Agency for Toxic Substances and Disease Registry (ATSDR) has established a chronic oral minimal risk level (MRL) of 0.00002 mg/kg/day for Aroclor 1254 based on a study in which a decrease in functioning of the immune system was observed in rhesus monkeys fed with the compound in a mixture of corn oil for a period of 55 months. The MRL is an estimate of daily human exposure to a contaminant that is unlikely to cause adverse health effects over a lifetime. At 55 months, there was a significant dose-related decrease in immunoglobulin titers in response to challenges with sheep red blood cell antigens. The lowest dose level tested, 0.005 mg/kg/day, was considered the lowest observable adverse effects level (LOAEL) for decreased antibody response. Uncertainty factors used in the MRL derivation include 10 for use of a LOAEL, 3 for extrapolation from animals to humans, and 10 for human variability. Studies in species other than monkeys have given inconclusive immunologic findings in that changes in some immune parameters were sporadic, generally not dose-related, or occurred at much higher levels [3].

Cancer Effects

Studies in animals show that PCBs containing 60% chlorine by weight are clearly carcinogenic and indicate differences in the carcinogenic potential of other PCB mixtures, based on the degree of chlorination. Available data suggest that the carcinogenic potency decreases with the percent chlorination. Hepatocellular (liver) carcinomas developed in rats fed an estimated dose of 5 mg/kg/day Aroclor 1260 for 21 months [3].

Animals treated intermediately or chronically with Aroclors 1254 or 1260 showed statistically increased incidences of liver adenomas and carcinomas. To investigate hepatic tumor progression after exposure has stopped, groups of rats were exposed for 52 weeks, then exposure was discontinued for an additional 52 weeks. For Aroclor 1260, the "stop-study" tumor incidences were greater than those of the lifetime study, indicating persistent biological activity after exposure stops for the more highly chlorinated Aroclors. Other cancers observed in animals include thyroid gland carcinomas, adenocarcinoma of the stomach, leukemia and lymphoma [3].

Table 2. Exposure dose matrix for different potential exposure scenarios. Exposure based on ingestion of PCB contaminated soil at each of the two residences where PCB levels exceeded HAC values. Exposure expressed in mg/kg/day.[1]

Soil concentration = 28 mg/kg Aroclor 1260 (0-6") from the residence immediately south of the site						
		average daily soil ingestion rate				
weight (kg)	age (years)	25 mg	50 mg	100 mg	150 mg	200 mg
15	3-6	4.6x10-5	9.3x10-5	1.9x10-4	2.8x10-4	3.7x10-4
35	10-11	2x10-5	4x10-5	8x10-5	1.2x10-4	1.6x10-4
70	adult	1x10-5	2x10-5	4x10-5	6x10-5	8x10-5
Soil concentration = 85 mg/kg Aroclor 1260 (0-6") from the Doyle residence						
15	3-6	1.4x10-4	2.8x10-4	5.7x10-4	8.5x10-4	1.1x10-3
35	10-11	6.1x10-5	1.2x10-4	2.4x10-4	3.6x10-4	4.8x10-4
70	adult	3.0x10-5	6.1x10-5	1.2x10-4	1.8x10-4	2.4x10-4

[1] Shaded Areas represent scenarios where ATSDR's MRL was exceeded.

CHILD HEALTH INITIATIVE

ATSDR's Child Health Initiative recognizes that the unique vulnerabilities of infants and children demand special emphasis in communities faced with contamination of their water, soil, air, or food. Children are at greater risk than adults from certain kinds of exposures to hazardous substances emitted from waste sites and emergency events. They are more likely to be exposed because they play outdoors and they often bring food into contaminated areas. They are shorter than adults, which means they breathe dust, soil, and heavy vapors close to the ground. Children also are smaller, resulting in higher doses of chemical exposure per body weight. The developing body systems of children can sustain permanent damage if toxic exposures occur during critical growth stages. Most importantly, children depend completely on adults for risk identification and management decisions, housing decisions, and access to medical care.

We evaluated the potential for children living in the vicinity of the Doyle Transformer site to be exposed to polychlorinated biphenyls at levels of health concern. Currently children are not likely to be chronically exposed to contaminants at this site; however, infrequent contact is possible. Children living at the residence south of the site and at the owner's property could be exposed to PCBs at levels of health concern.

REFERENCES

1. Texas Natural Resource Conservation Commission, 1998. Screening Site Inspection Report for Doyle Transformer Site, Leonard, Fannin County, Texas. Prepared in cooperation with the U.S. Environmental Protection Agency. May 1998.

2. U.S. Environmental Protection Agency, Integrated Risk Information System, Adobe Acrobat Portable Format Files, 1999.

3. Agency for Toxic Substances and Disease Registry. Toxicological profile for polychorinated biphenyls, Atlanta: ATSDR, Sept. 1997.

4. Brown, D.P. Mortality of workers exposed to polychorinated biphenyls, an update. Arch. Environmental Health. 42 (6): 333-339.

5. Bertazzi, P.A., et.al., Cancer mortality of capacitor manufacturing workers. Am. J. Ind. Med. 11(2): 165-176.

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 18, 2010

Mr. Charles R. Robertson
Vice President
Terra-Solve, Inc.
3216 Commander Drive, Suite 103
Carrollton, Texas 75006-2518

Re: Comments to "Request for Additional Information"
Former F.J. Doyle Salvage
(b) (6) (905 N. Poplar Street), Leonard, Fannin County, Texas
TCEQ SWR No. 80951; EPA CERCLIS No. TXD980865109; Customer No. CN600359095; Regulated Entity No. RN100649227

Dear Mr. Robertson:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above referenced submittal. A list of the comments is enclosed.

Please call me at (512) 239-4940 if you need additional information or wish to discuss these comments or the due date. Thank you for your cooperation in this matter.

Sincerely,

PLall

Pindy Lall, Project Manager
VCP Team 1, VCP-CA Section
Remediation Division

PSL/jdm

Enclosure: Comments

cc: Mr. Sam Barrett, Waste Program Manager, TCEQ Region 4, Dallas/Fort Worth

TCEQ letter dated June 18, 2010
ENCLOSURE
TCEQ SWR No. 80951

Comments

1. Surface soils need to be delineated horizontally to 1.1 mg/kg for polychlorinated biphenyls (PCBs). Surface soils under Texas Risk Reduction Program (TRRP) are soils at a depth of 0-15 feet. Copper and hexachlorobenzene will also be required to be delineated horizontally.

2. Soil contamination will need to be delineated vertically.
   a. Soil vertical delineation is required to method quantitation limit (MQL) unless a groundwater sample is taken at the site.
   b. If a groundwater sample is taken, the entire soil column can be assumed to be contaminated.

3. If the site enters the Voluntary Cleanup Program (VCP), a groundwater sample will be required.

4. In situations where the entire soil column is assumed to be contaminated, a control (such as a parking lot that serves as an impervious cover) may be implemented to prevent exposure. A parking lot may be utilized as a impervious cover depending on the material used; however, maintenance of the parking lot would be required to ensure the integrity of the parking lot as a control. Any area that is not covered will be required to be removed, decontaminated, and/or controlled by other means.

5. A demonstration that the drainage ditches are not impacting surface water will be necessary.

SSchreier

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 5, 2008

CERTIFIED MAIL
91 7108 2133 3935 1880 9979

Mr. Danny Doyle
F. J. Doyle Salvage
(b) (6)
Leonard, Texas 75452

Re: **Second Request for Remediation Status Update**
F. J. Doyle Salvage Transformers, TCEQ SWR No. 80951

Dear Mr. Doyle:

The Texas Commission on Environmental Quality (TCEQ) has conducted a review of our Central Records file to determine the status of environmental activities associated with the above referenced site. According to our file review, the TCEQ's letter dated January 26, 2007, requested submittal of a Unit Closure Report and an Affected Property Assessment Report. Based on our review, the TCEQ has not received either of these requested documents. The TCEQ has attached a copy of the TCEQ letter dated January 26, 2008 for your reference.

The F. J. Doyle Salvage Transformers facility is advised that failure to comply with all TCEQ corrective action directives and subsequent requests, including the specified time frames, may result in the initiation of formal enforcement action by the TCEQ. **The requested Unit Closure Report and Affected Property Assessment Report must be provided within fifteen (15) days of the date of this letter.**

An original and one copy of the above referenced response must be submitted to the TCEQ Remediation Division at the letterhead address using Mail Code MC-127. An additional copy should be submitted to the TCEQ Region 4 Office in Fort Worth, Texas. The facility name, location and identification number(s) in the TCEQ reference line above should be included in your response. Questions concerning this letter should be directed to me at (512) 239-5454.

Sincerely,

Sarah A. Schreier, P. G., Project Manager
Team 1, Environmental Cleanup Section II
Remediation Division

SAS/jhm

Enclosure: TCEQ's letter to Mr. Danny Doyle dated January 26, 2007

cc: Waste Program Manager, TCEQ Region 4 Office, Fort Worth, Texas
Mr. Danny Doyle , F. J. Doyle Salvage, P. O. Box 312, Leonard, Texas 75452-0312

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 26, 2007

Mr. Danny Doyle
F. J. Doyle Salvage
P. O. Box 312
Leonard, Texas 75452-0312

Re: Unit Closure Request and Assessment Request
F. J. Doyle Salvage Transformers
SWR No. 80951

Dear Mr. Doyle:

The Texas Commission on Environmental Quality (TCEQ) has received your letter dated 23 October 2006 in response to our 14 July 2006 letter requesting a Unit Closure Report for three Waste Management Units still listed as active at the F. J. Doyle Salvage Transformers facility at 305 E. Cottonwood, Leonard, TX 75425. In your response, you requested additional clarification of what information needed to be submitted to the TCEQ. Specifically, you asked for clarification on what a waste management unit was, and indicated that you needed some guidance on where to find a Notice of Registration number.

Generally, a waste management unit is any area where waste is placed. Examples of waste management units include surface impoundments; waste piles; land treatment areas; landfill cells; incinerators; tanks and their associated piping and underlying containment system; and container storage areas. A container alone is not a waste management unit; the unit includes containers and the land or pad upon which they are placed.

For your reference I have attached a report containing Notice of Registration information relevant to this facility. Page 3 of the report describes what waste management units are listed as "active" at this location. Page 2 describes the wastes that were stored or managed in each waste management unit. My phone number and email are in the last paragraph of this letter; *please* contact me if you have questions about this attachment.

The Notice of Registration number is simply a reference number used assigned to each unit at a facility for ease of reference. It is typically a three digit number found on the far left of the unit description in the Notice of Registration (see page 3 of the attached report). In this case your waste management unit Notice of Registration numbers are: 001 for various storage containers on a concrete pad, 002 for the thermal process unit, and 003 for the dumpster.

Dallas/Fort Worth Office at 2309 Gravel Drive, Fort Worth, Texas, 76118-6951. Your response must be received on or before May 31, 2007. The facility name, location and identification number(s) in the reference line of this letter should be included in your response.

Please contact me at (512)239-5454, or email at sschreie@tceq.state.tx.us if you need any additional information or clarification, or if you wish to discuss the due date. I look forward to speaking with you in the near future.

Sincerely,

Sarah A. Schreier, P. G., Project Manager
Team 1, Environmental Cleanup Section 2
Remediation Division
Texas Commission on Environmental

SS/cjh

Enclosure(s): Enclosure 1 – Notice of Registration
Enclosure 2 – Health Consultation, Doyle Transformer Site, Leonard, Texas, Fannin County (June 29, 2000)

cc: Mr. Danny Doyle, (b) (6) Leonard, TX 75452
Waste Program Manager, TCEQ Region 4 Office, Dallas/Fort Worth

Report Name :
Report Progam : TRACS_EXEC_DIR/ihw_nor_report
Date : 19-jan-2007 10:05:40
User ID : csiegel

Selection Criteria

SW Regis. #s : 80951

Selected All Wastes

Sort Criteria: Registration Number

*** TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ***

Notice of Registration

Industrial and Hazardous Waste

80951 F J Doyle Salvage Transformers

**** WASTE INFORMATION ****

Texas Waste Code	Waste Class	Status	Date of Status	Managed Onsite/ Offsite	Radio-active	TCEQ Audit Complete

****** Active Wastes ******

00012061 1 Active 07/27/93 On/Off No

Description from Generator: Used oil from non-PCB Transformers being scrapped out for salvage; initial generation: 1/86

Texas Form Code: 206 Waste oil

Current Management Units: Misc Store Container 001

* Origin Codes: 3 From non-haz waste mgmt

00023041 1 Active 07/27/93 On/Off No

Description from Generator: Ash residue from furnace used to remove varnish from copper wire; initial generation: 1/86

Texas Form Code: 304 Other "dry" ash, slag, or thermal inorgan. residue

Current Management Units: Thermal Process Unit 002

* Origin Codes: 3 From non-haz waste mgmt

00039012 2 Active 07/27/93 On/Off No

Description from Generator: General plant refuse from office and shop

Texas Form Code: 901 Plant production refuse

Current Management Units: Misc Store Container 003

* Origin Codes: 1 Onsite-process/service

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* The first value is considered the primary value (e.g. primary origin code).

As of 04/24/2006, the next unassigned sequence number for WASTES is 0004.

Enclosure 2

Health Consultation, Doyle Transformer Site, Leonard, Texas, Fannin County (June 29, 2000)

BACKGROUND AND STATEMENT OF ISSUES

The Texas Natural Resource Conservation Commission (TNRCC) requested that the Texas Department of Health (TDH) evaluate the potential health risks associated with exposure to polychlorinated biphenyls (PCBs) in soil on and near the Frank J. Doyle Transformer site in Leonard, Fannin County, Texas. The site consists of approximately one-half acre surrounded by a six-foot wooden fence and is an active registered salvage yard that receives and processes used power transmission transformers for recoverable metals [1]. Polychlorinated biphenyls were widely used as coolants in transformers before they were banned in 1977 [2]. There is conflicting information as to whether transformers still are being processed on the site.

The site is bordered to the north by a residential area, to the east by Leonard High School, to the south by an alleyway and a residence, and to the west by the owner's residence. The alleyway is used infrequently and is covered by a layer of gravel. A day care center, which contains has outside play areas for children, is located southwest of the site across the alley.

As a result of residential concerns regarding exposures to PCBs in 1995 and in 1998, the Environmental Protection Agency (EPA) and TNRCC collected soil samples on and around the facility. Samples were collected on the site, in the Doyle residential yard adjacent to the site, in the alleyway, in the residential yard south of the site, in drainage ditches downgradient of the site, in the day care center yard, and in the high school yard (Table 1, Figure 1).

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Based on average soil ingestion rates of 100 mg/day for 70 kg adults and 200 mg/day for 15 kg children, HAC values for adults and children (14 mg/kg and 1.5 mg/kg) were exceeded in surface soil samples from both residences (Table 1). While exceeding a HAC value does not imply that the contaminant represents a public health threat, it does suggest that site-specific exposure evaluation of the contaminant warrants further consideration.

Polychlorinated Biphenyls (PCBs)

Background

PCBs are a group of synthetic organic chemicals that contain 209 individual chlorinated biphenyl compounds (known as congeners) with varying harmful effects. They are either oily liquids or solids and are colorless, odorless, and tasteless. There were seven common types of commercially available PCB mixtures, also known as "Aroclors," which constitute 98% of PCBs sold in the United States since 1970. The name Aroclor 1254 means that the molecule contains 12 carbon atoms (first two digits) and approximately 54% chlorine by weight (second two digits). The more highly chlorinated Aroclors have been found to have greater potential for adverse health effects in humans and animals. There are no known natural sources of PCBs in the environment. Typical concentrations in soil are less than 0.01 to 0.04 mg/kg [3].

Because they don't burn easily and are good insulating materials, PCBs have been used widely as coolants and lubricants in transformers, capacitors, and other electrical equipment. The manufacture of PCBs stopped in the United States in 1977 because of evidence that they build up in the environment and cause harmful health effects. Today, PCBs can be released into the environment from poorly maintained hazardous waste sites that process used electrical transformers or by burning of organic wastes in municipal and industrial incinerators.

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The Agency for Toxic Substances and Disease Registry (ATSDR) has established a chronic oral minimal risk level (MRL) of 0.00002 mg/kg/day for Aroclor 1254 based on a study in which a decrease in functioning of the immune system was observed in rhesus monkeys fed with the compound in a mixture of corn oil for a period of 55 months. The MRL is an estimate of daily human exposure to a contaminant that is unlikely to cause adverse health effects over a lifetime. At 55 months, there was a significant dose-related decrease in immunoglobulin titers in response to challenges with sheep red blood cell antigens. The lowest dose level tested, 0.005 mg/kg/day, was considered the lowest observable adverse effects level (LOAEL) for decreased antibody response. Uncertainty factors used in the MRL derivation include 10 for use of a LOAEL, 3 for extrapolation from animals to humans, and 10 for human variability. Studies in species other than monkeys have given inconclusive immunologic findings in that changes in some immune parameters were sporadic, generally not dose-related, or occurred at much higher levels [3].

Cancer Effects

Studies in animals show that PCBs containing 60% chlorine by weight are clearly carcinogenic and indicate differences in the carcinogenic potential of other PCB mixtures, based on the degree of chlorination. Available data suggest that the carcinogenic potency decreases with the percent chlorination. Hepatocellular (liver) carcinomas developed in rats fed an estimated dose of 5 mg/kg/day Aroclor 1260 for 21 months [3].

Animals treated intermediately or chronically with Aroclors 1254 or 1260 showed statistically increased incidences of liver adenomas and carcinomas. To investigate hepatic tumor progression after exposure has stopped, groups of rats were exposed for 52 weeks, then exposure was discontinued for an additional 52 weeks. For Aroclor 1260, the "stop-study" tumor incidences were greater than those of the lifetime study, indicating persistent biological activity after exposure stops for the more highly chlorinated Aroclors. Other cancers observed in animals include thyroid gland carcinomas, adenocarcinoma of the stomach, leukemia and lymphoma [3].

Table 2. Exposure dose matrix for different potential exposure scenarios. Exposure based on ingestion of PCB contaminated soil at each of the two residences where PCB levels exceeded HAC values. Exposure expressed in mg/kg/day.[1]

Soil concentration = 28 mg/kg Aroclor 1260 (0-6") from the residence immediately south of the site						
		average daily soil ingestion rate				
weight (kg)	age (years)	25 mg	50 mg	100 mg	150 mg	200 mg
15	3-6	4.6x10-5	9.3x10-5	1.9x10-4	2.8x10-4	3.7x10-4
35	10-11	2x10-5	4x10-5	8x10-5	1.2x10-4	1.6x10-4
70	adult	1x10-5	2x10-5	4x10-5	6x10-5	8x10-5
Soil concentration = 85 mg/kg Aroclor 1260 (0-6") from the Doyle residence						
15	3-6	1.4x10-4	2.8x10-4	5.7x10-4	8.5x10-4	1.1x10-3
35	10-11	6.1x10-5	1.2x10-4	2.4x10-4	3.6x10-4	4.8x10-4
70	adult	3.6x10-5	6.1x10-5	1.2x10-4	1.8x10-4	2.4x10-4

[1] Shaded Areas represent scenarios where ATSDR's MRL was exceeded.

CHILD HEALTH INITIATIVE

ATSDR's Child Health Initiative recognizes that the unique vulnerabilities of infants and children demand special emphasis in communities faced with contamination of their water, soil, air, or food. Children are at greater risk than adults from certain kinds of exposures to hazardous substances emitted from waste sites and emergency events. They are more likely to be exposed because they play outdoors and they often bring food into contaminated areas. They are shorter than adults, which means they breathe dust, soil, and heavy vapors close to the ground. Children also are smaller, resulting in higher doses of chemical exposure per body weight. The developing body systems of children can sustain permanent damage if toxic exposures occur during critical growth stages. Most importantly, children depend completely on adults for risk identification and management decisions, housing decisions, and access to medical care.

We evaluated the potential for children living in the vicinity of the Doyle Transformer site to be exposed to polychlorinated biphenyls at levels of health concern. Currently children are not likely to be chronically exposed to contaminants at this site; however, infrequent contact is possible. Children living at the residence south of the site and at the owner's property could be exposed to PCBs at levels of health concern.

REFERENCES

1. Texas Natural Resource Conservation Commission, 1998. Screening Site Inspection Report for Doyle Transformer Site, Leonard, Fannin County, Texas. Prepared in cooperation with the U.S. Environmental Protection Agency. May 1998.

2. U.S. Environmental Protection Agency, Integrated Risk Information System, Adobe Acrobat Portable Format Files, 1999.

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4. Brown, D.P. Mortality of workers exposed to polychorinated biphenyls, an update. Arch. Environmental Health. 42 (6): 333-339.

5. Bertazzi, P.A., et.al., Cancer mortality of capacitor manufacturing workers. Am. J. Ind. Med. 11(2): 165-176.

CERTIFICATION

This Doyle Transformer Site Health Consultation was prepared by the Texas Department of Health under a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR). It is in accordance with approved methodology and procedures existing at the time the Health Consultation was initiated.

Technical Project Officer, SPS, SSAB, DHAC, ATSDR

The Division of Health Assessment and Consultation, ATSDR, has reviewed this Health Consultation and concurs with its findings.

Chief, State Programs Section, SSAB, DHAC, ATSDR

DO NOT SEND THIS PAGE[1]
bcc list (format revised 12/05/2006):

Central Records (MC-199)
IHWCA files (MC-127)

For data entry:

ARTS COMMUNICATION ID:	**N/A**
This letter is (Pick one):	**RESPONSE DUE/LATE LETTER**
LBB (04 or 06, and number to count):	N/A
Reply from facility needed? If so, give reply due date:	September 22, 2008
Document Review(s) Complete? (Yes/No)	yes
ARTS LEGAL PROPERTY: CAS Status value changed for entire facility (Put new status or n/a)[2]?	N/A
ARTS PHYSICAL UPDATES (n/a, if not applicable)[3]: Physical Name:	N/A
New Physical Status:	N/A
For entry into RCRAInfo: Number of units (n/a, if not applicable):	N/A
Corrective Action Codes (RFI units/areas) CA-	N/A
or	
Closure Codes (RCRA/Interim Status units) CL-	N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 26, 2007

Mr. Danny Doyle
F. J. Doyle Salvage
P. O. Box 312
Leonard, Texas 75452-0312

Re: Unit Closure Request and Assessment Request
F. J. Doyle Salvage Transformers
SWR No. 80951

Dear Mr. Doyle:

The Texas Commission on Environmental Quality (TCEQ) has received your letter dated 23 October 2006 in response to our 14 July 2006 letter requesting a Unit Closure Report for three Waste Management Units still listed as active at the F. J. Doyle Salvage Transformers facility at 305 E. Cottonwood, Leonard, TX 75425. In your response, you requested additional clarification of what information needed to be submitted to the TCEQ. Specifically, you asked for clarification on what a waste management unit was, and indicated that you needed some guidance on where to find a Notice of Registration number.

Generally, a waste management unit is any area where waste is placed. Examples of waste management units include surface impoundments; waste piles; land treatment areas; landfill cells; incinerators; tanks and their associated piping and underlying containment system; and container storage areas. A container alone is not a waste management unit; the unit includes containers and the land or pad upon which they are placed.

For your reference I have attached a report containing Notice of Registration information relevant to this facility. Page 3 of the report describes what waste management units are listed as "active" at this location. Page 2 describes the wastes that were stored or managed in each waste management unit. My phone number and email are in the last paragraph of this letter; *please* contact me if you have questions about this attachment.

The Notice of Registration number is simply a reference number used assigned to each unit at a facility for ease of reference. It is typically a three digit number found on the far left of the unit description in the Notice of Registration (see page 3 of the attached report). In this case your waste management unit Notice of Registration numbers are: 001 for various storage containers on a concrete pad, 002 for the thermal process unit, and 003 for the dumpster.

Dallas/Fort Worth Office at 2309 Gravel Drive, Fort Worth, Texas, 76118-6951. Your response must be received on or before May 31, 2007. The facility name, location and identification number(s) in the reference line of this letter should be included in your response.

Please contact me at (512)239-5454, or email at sschreie@tceq.state.tx.us if you need any additional information or clarification, or if you wish to discuss the due date. I look forward to speaking with you in the near future.

Sincerely,

Sarah A. Schreier, P. G., Project Manager
Team 1, Environmental Cleanup Section 2
Remediation Division
Texas Commission on Environmental

SS/cjh

Enclosure(s): Enclosure 1 – Notice of Registration
Enclosure 2 – Health Consultation, Doyle Transformer Site, Leonard, Texas, Fannin County (June 29, 2000)

cc: Mr. Danny Doyle, (b) (6) Leonard, TX 75452
Waste Program Manager, TCEQ Region 4 Office, Dallas/Fort Worth

*** Texas Commission on Environmental Quality ***
Notice of Registration
Industrial and Hazardous Waste

Date: 03/26/2015

)51 F J DOYLE

lid Waste Registration #: 80951 EPA ID:TXD980865109 CN: CN600359095 RN: RN100649227

mpany Name: F J DOYLE SALVAGE .ANSFORMERS Region: 4 Initial Registration Date: 07/21/1993

te Name: F J DOYLE County: 147 FANNIN Last Amendment Date: 04/24/2006

te Location: (b) (6) :ONARD, TX Land Type: PRIVATE Last Update Date: 04/27/2006

imary Contact: DOYLE, F J Title: ENVIRONMENTAL MANAGER

ailing Address: PO BOX 312 Phone:903-587-3342
LEONARD, TX, 75452-0312

egistration Status: CLOSURE REQUEST HW Permit: IW Permit: MW Permit:

.egistration Type: GENERATOR,TRANSPORTER

lazardous Waste Generation Type:

ransporter Business Type: Transport own waste only

ransport Waste Class: 1

Jniversal Waste Activity:

Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more):

Destination Facility for Universal Waste:

NAICS Code:

Tax ID: 0

80951 F J DOYLE

Owner Information

Name: F J DOYLE SALVAGE TRANSFORMERS,

Phone: 903-587-3342

Address: PO BOX 312

LEONARD, TX, 75452-0312

Operator Information

Billing Contact:

Title:

As of 04/24/2006 -

The next unassigned sequence number for WASTES is 0004.

The next unassigned sequence number for UNITS is 004.

80951 F J DOYLE

**** WASTE INFORMATION ****

Texas Waste Code	Waste Class	Status	Waste Status Code Change Date	Mixed Radioactive	TCEQ Audit Complete	Waste Update Date	Inactive Reason
****** Active Wastes ******							
00012061	1	Active		N	No	9/8/11	

Waste Description: Used oil from non-PCB Transformers being scrapped out for salvage; initial generation: 1/86
Date of Generation: 7/27/93

Texas Form Code: 206 - Waste oil

EPA Hazardous Waste Numbers: None
Current Management Units: 22 - Miscellaneous Storage Containers: 001, OFF-SITE
Origin Codes: 3 - Derived from on-site management of a nonhazardous waste
NAICS Code:
New Chemical Substance: N

00023041	1	Active		N	No	9/8/11	

Waste Description: Ash residue from furnace used to remove varnish from copper wire; initial generation: 1/86
Date of Generation: 7/27/93

Texas Form Code: 304 - Other 'dry' ash, slag or thermal residue

EPA Hazardous Waste Numbers: None
Current Management Units: 08 - Thermal Processing Unit, other than Incinerator: 002, OFF-SITE
Origin Codes: 3 - Derived from on-site management of a nonhazardous waste
NAICS Code:
New Chemical Substance: N

00039012	2	Active		N	No	9/8/11	

80951 F J DOYLE

Texas Waste Code	Waste Class	Status	Waste Status Code Change Date	Mixed Radioactive	TCEQ Audit Complete	Waste Update Date	Inactive Reason
****** Active Wastes ******							

Waste Description: General plant refuse from office and shop
Date of Generation: 7/27/93

Texas Form Code: 901 - Plant production refuse

EPA Hazardous Waste Numbers: None
Current Management Units: 22 - Miscellaneous Storage Containers: 003, OFF-SITE
Origin Codes: 1 - Generated on-site from a product process or service activity
NAICS Code:
New Chemical Substance: N

Texas Waste Code	Waste Class	Status	Waste Status Code Change Date	Mixed Radioactive	TCEQ Audit Complete	Waste Update Date	Inactive Reason
** No Longer Generated Wastes **							

80951 F J DOYLE

**** UNITS AT THIS SITE MANAGING WASTE ****

WMU Sequence Number	Unit Capacity	Capacity UOM	Unit Status	Date of Unit Regis	Class of Waste from Offsite	UIC Permit Number	Unit Number on Permit	Unit Update Date	Deed Record Date
** 'Active', 'Closure Pending' & 'Closure Request' Units **									
001			CLOSURE REQUEST	4/24/06				9/14/11	

Unit Type: Miscellaneous Storage Containers
Unit Regulatory Status: 05 Non-Hazardous Regulated
Unit Description: Various storage containers 1 x375 gallon, 2 x 500 gallon and 55 gallon drums. Stored on concrete pad
Billing Class:
System Type Cd: 141 Storage

Wastes Currently Managed in Unit: 00012061 Used oil from non-PC
Wastes Previously Managed in Unit: None

002			CLOSURE REQUEST	4/24/06				9/14/11	

Unit Type: Thermal Processing Unit, other than Incinerator
Unit Regulatory Status: 05 Non-Hazardous Regulated
Unit Description: High temperature oven to burn varnish off copper
Billing Class:
System Type Cd: 010 Metals recovery including retorting, smelting, chemical, etc.

Wastes Currently Managed in Unit: 00023041 Ash residue from fur
Wastes Previously Managed in Unit: None

003			CLOSURE REQUEST	4/24/06				9/14/1	

00039012 2 Active

951 F J DOYLE

MU Sequence Number	Unit Capacity	Capacity UOM	Unit Status	Date of Unit Regis	Class of Waste from Offsite	UIC Permit Number	Unit Number on Permit	Unit Update Date	Deed Record Date
'Active', 'Closure Pending' & 'Closure Request' Units **									

Unit Type: Miscellaneous Storage Containers

Unit Regulatory Status: 05 Non-Hazardous Regulated

Unit Description: Dumpster, 4 yd for accumulation of plant trash

Billing Class:

System Type Cd: 141 Storage

Wastes Currently Managed in Unit: 00039012 General plant refuse

Wastes Previously Managed in Unit: None

MU Sequence Number	Unit Capacity	Capacity UOM	Unit Status	Date of Unit Regis	Class of Waste from Offsite	UIC Permit Number	Unit Number on Permit	Unit Update Date	Deed Record Date
'Inactive', 'Closed', 'Post Closure Care', 'Never Built' & 'Not Required' Units **									

U uence nber	Unit Capacity	Capacity UOM	Unit Status	Date of Unit Regis	Class of Waste from Offsite	UIC Permit Number	Unit Number on Permit	Unit Update Date	Deed Record Date
Not Yet Built' & 'Under Construction' Units **									

Enclosure 2

Health Consultation, Doyle Transformer Site, Leonard, Texas, Fannin County (June 29, 2000)

Doyle Transformer Site Consultation

BACKGROUND AND STATEMENT OF ISSUES

The Texas Natural Resource Conservation Commission (TNRCC) requested that the Texas Department of Health (TDH) evaluate the potential health risks associated with exposure to polychlorinated biphenyls (PCBs) in soil on and near the Frank J. Doyle Transformer site in Leonard, Fannin County, Texas. The site consists of approximately one-half acre surrounded by a six-foot wooden fence and is an active registered salvage yard that receives and processes used power transmission transformers for recoverable metals [1]. Polychlorinated biphenyls were widely used as coolants in transformers before they were banned in 1977 [2]. There is conflicting information as to whether transformers still are being processed on the site.

The site is bordered to the north by a residential area, to the east by Leonard High School, to the south by an alleyway and a residence, and to the west by the owner's residence. The alleyway is used infrequently and is covered by a layer of gravel. A day care center, which contains has outside play areas for children, is located southwest of the site across the alley.

As a result of residential concerns regarding exposures to PCBs in 1995 and in 1998, the Environmental Protection Agency (EPA) and TNRCC collected soil samples on and around the facility. Samples were collected on the site, in the Doyle residential yard adjacent to the site, in the alleyway, in the residential yard south of the site, in drainage ditches downgradient of the site, in the day care center yard, and in the high school yard (Table 1, Figure 1).

Surface-soil samples (0-6") from the residential yard south of the site and from the owner's residential yard contained maximum PCB concentrations of 27.9 milligrams-PCB/kilogram-soil (mg/kg) and 85 mg/kg, respectively. The maximum concentrations of PCBs in surface-soil samples from all other locations off-site ranged from non-detectable to 5.7 mg/kg. Three on-site surface soil samples contained 2.0 to 10.4 mg PCB/kg soil. Sub-surface soil samples (6-24") revealed elevated levels of PCBs on the site (maximum 2,300 mg/kg), in the alleyway (maximum 4,100 mg/kg), and in the drainage ditches downgradient from the site (maximum 37.7 mg/kg) (Figure 1).

In addition to soil samples, three groundwater samples (and one duplicate) were collected from two city of Leonard municipal water wells and one privately owned drinking water well. Samples were analyzed for pesticides, polychlorinated biphenyls (PCBs), semi-volatile and volatile organic compounds, and metals. None of the groundwater samples contained significant quantities of pesticides, PCBs, semi-volatile and volatile organic chemicals or metals.

DISCUSSION

Health Assessment Comparison Values

In order to assess the potential health risks associated with soil exposure to a specific PCB, Aroclor 1260, we compared the reported concentrations to health assessment comparison (HAC) values for non-carcinogenic and carcinogenic endpoints (see toxicological evaluation section below). Currently, there are no HAC values specifically for Aroclor 1260 [3]; therefore, we based the non-cancer comparison value for Aroclor 1260 on the Agency for Toxic Substances and Disease Registry's (ATSDR's) minimal risk level (MRL) for the structurally similar compound Aroclor 1254. The MRL is an estimate of a daily human exposure to a contaminant that is unlikely to cause adverse non-cancer health effects over a lifetime. We based the cancer risk comparison value for Aroclor 1260 on the U.S. Environmental Protection Agency's (EPA's) cancer slope factor for PCBs as a class of chemicals and an estimated excess lifetime cancer risk of one-in-one million for persons exposed for 30 years.

Based on average soil ingestion rates of 100 mg/day for 70 kg adults and 200 mg/day for 15 kg children, HAC values for adults and children (14 mg/kg and 1.5 mg/kg) were exceeded in surface soil samples from both residences (Table 1). While exceeding a HAC value does not imply that the contaminant represents a public health threat, it does suggest that site-specific exposure evaluation of the contaminant warrants further consideration.

Polychlorinated Biphenyls (PCBs)

Background

PCBs are a group of synthetic organic chemicals that contain 209 individual chlorinated biphenyl compounds (known as congeners) with varying harmful effects. They are either oily liquids or solids and are colorless, odorless, and tasteless. There were seven common types of commercially available PCB mixtures, also known as "Aroclors," which constitute 98% of PCBs sold in the United States since 1970. The name Aroclor 1254 means that the molecule contains 12 carbon atoms (first two digits) and approximately 54% chlorine by weight (second two digits). The more highly chlorinated Aroclors have been found to have greater potential for adverse health effects in humans and animals. There are no known natural sources of PCBs in the environment. Typical concentrations in soil are less than 0.01 to 0.04 mg/kg [3].

Because they don't burn easily and are good insulating materials, PCBs have been used widely as coolants and lubricants in transformers, capacitors, and other electrical equipment. The manufacture of PCBs stopped in the United States in 1977 because of evidence that they build up in the environment and cause harmful health effects. Today, PCBs can be released into the environment from poorly maintained hazardous waste sites that process used electrical transformers or by burning of organic wastes in municipal and industrial incinerators.

Environmental Fate

PCBs released into the environment bind strongly to soil and sediments and may remain there for several years to many decades. Because of the strong adherence to soil, migration of the highly

Other effects observed in animals include increased hepatic microsomal enzyme induction, liver enlargement, fat deposition, fibrosis, and necrosis, increased cholesterol (animals), thyroid enlargement with decreased production of thyroid hormones, increased adrenal gland production reported as an adaptive response to stress, facial edema, acne, fingernail loss, loss of hair in monkeys, weight loss, and kidney damage. However, the levels necessary to produce those effects were very high and it is not known if the same effects would happen in people chronically exposed to lower levels [3].

Inhalation of PCBs by workers employed in capacitor facilities has been observed to cause upper respiratory tract or eye irritation, cough, headaches, and tightness of the chest. Hepatic effects, such as increased levels of serum liver-related enzymes may be related to inhalation of PCB particles [4].

Weak correlations between PCB exposure and depressed immunological function, specifically a reduction in natural killer (NK) cells, have been found in humans consuming PCB-contaminated fish; however, these studies are confounded by the coinciding presence of DDT, which also has been associated with affecting the immune system.

The Agency for Toxic Substances and Disease Registry (ATSDR) has established a chronic oral minimal risk level (MRL) of 0.00002 mg/kg/day for Aroclor 1254 based on a study in which a decrease in functioning of the immune system was observed in rhesus monkeys fed with the compound in a mixture of corn oil for a period of 55 months. The MRL is an estimate of daily human exposure to a contaminant that is unlikely to cause adverse health effects over a lifetime. At 55 months, there was a significant dose-related decrease in immunoglobulin titers in response to challenges with sheep red blood cell antigens. The lowest dose level tested, 0.005 mg/kg/day, was considered the lowest observable adverse effects level (LOAEL) for decreased antibody response. Uncertainty factors used in the MRL derivation include 10 for use of a LOAEL, 3 for extrapolation from animals to humans, and 10 for human variability. Studies in species other than monkeys have given inconclusive immunologic findings in that changes in some immune parameters were sporadic, generally not dose-related, or occurred at much higher levels [3].

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Table 2. Exposure dose matrix for different potential exposure scenarios. Exposure based on ingestion of PCB contaminated soil at each of the two residences where PCB levels exceeded HAC values. Exposure expressed in mg/kg/day.[1]

Soil concentration = 28 mg/kg Aroclor 1260 (0-6") from the residence immediately south of the site						
		average daily soil ingestion rate				
weight (kg)	age (years)	25 mg	50 mg	100 mg	150 mg	200 mg
15	3-6	4.6x10-5	9.3x10-5	1.9x10-4	2.8x10-4	3.7x10-4
35	10-11	2x10-5	4x10-5	8x10-5	1.2x10-4	1.6x10-4
70	adult	1x10-5	2x10-5	4x10-5	6x10-5	8x10-5
Soil concentration = 85 mg/kg Aroclor 1260 (0-6") from the Doyle residence						
15	3-6	1.4x10-4	2.8x10-4	5.7x10-4	8.5x10-4	1.1x10-3
35	10-11	6.1x10-5	1.2x10-4	2.4x10-4	3.6x10-4	4.8x10-4
70	adult	3.0x10-5	6.1x10-5	1.2x10-4	1.8x10-4	2.4x10-4

[1] Shaded Areas represent scenarios where ATSDR's MRL was exceeded.

CHILD HEALTH INITIATIVE

ATSDR's Child Health Initiative recognizes that the unique vulnerabilities of infants and children demand special emphasis in communities faced with contamination of their water, soil, air, or food. Children are at greater risk than adults from certain kinds of exposures to hazardous substances emitted from waste sites and emergency events. They are more likely to be exposed because they play outdoors and they often bring food into contaminated areas. They are shorter than adults, which means they breathe dust, soil, and heavy vapors close to the ground. Children also are smaller, resulting in higher doses of chemical exposure per body weight. The developing body systems of children can sustain permanent damage if toxic exposures occur during critical growth stages. Most importantly, children depend completely on adults for risk identification and management decisions, housing decisions, and access to medical care.

We evaluated the potential for children living in the vicinity of the Doyle Transformer site to be exposed to polychlorinated biphenyls at levels of health concern. Currently children are not likely to be chronically exposed to contaminants at this site; however, infrequent contact is possible. Children living at the residence south of the site and at the owner's property could be exposed to PCBs at levels of health concern.

REFERENCES

1. Texas Natural Resource Conservation Commission, 1998. Screening Site Inspection Report for Doyle Transformer Site, Leonard, Fannin County, Texas. Prepared in cooperation with the U.S. Environmental Protection Agency. May 1998.

2. U.S. Environmental Protection Agency, Integrated Risk Information System, Adobe Acrobat Portable Format Files, 1999.

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5. Bertazzi, P.A., et.al., Cancer mortality of capacitor manufacturing workers. Am. J. Ind. Med. 11(2): 165-176.

MDS

REGISTRATION AND REPORTING
Action Request Form

T/F/IHW 80951 CO
WWC COMM# 12000388 RP
PROJ. MGR. jsirotk

TO:	~~Chris Siegel~~ OOPS! Corrective Action Section/ MC 127 Remediation Division
FROM:	CAROL GENSWEIDER, Staff Industrial and Hazardous Waste Registration Team Registration and Reporting Section Registration, Review and Reporting Division Mail Code 129 Telephone 239-6861
DATE:	4-27-06
RE:	Request to Close a Waste Management Unit (WMU) and/or Notice of Registration SWR # 80951

The Registration and Reporting Section has received the attached correspondence requesting to close a WMU or a facility. All non-closure updates have been addressed.

List of WMU(s) for Closure or R&R Staff Comments:
3 waste management units need closure.
Thanks
Carol G.

Received
MAY 02 2006
Remedia...
Corr...

MR

IHW [illegible] 00

April 24, 2006

Texas Commission On Environmental Quality
IHW Registration

To Whom It May Concern:

[illegible]
[illegible]
[illegible]
[illegible]
[illegible]

Received

MAY 02 2006

[illegible]

APR 27 2006

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

REMINDER

F J Doyle
F J Doyle Salvage Transformers
PO Box 312
Leonard, TX 75452

April 17, 2006

Re: Solid Waste Registration No. 80951
305 E Cottonwood
Leonard, TX 75452

Dear F J Doyle:

The Texas Commission on Environmental Quality (TCEQ) is the designated agency to track industrial, hazardous and solid waste generation, treatment, storage and/or disposal in the State of Texas. A recent records review of the self-reporting system indicates that we have not received the 2005 Annual Waste Summary report concerning the disposition of solid waste for the above registration.

If you have previously submitted the report, please send us a copy for our records. If you have not submitted the report, please do so using the enclosed Annual Waste Summary form or transmit using your local STEERS program. Please send this report to the Permitting & Remediation Support Division, Registration and Reporting Section, IHW Registration Team, MC-129, Post Office Box 13087, Austin, Texas 78711-3087. We should receive the report by May 8, 2006.

The reporting requirements are contained in the industrial solid waste and municipal hazardous waste management regulations of the Texas Commission on Environmental Quality (30 Texas Administrative Code, Chapter 335.9). Failure to submit the proper report is considered a violation of this regulation and the Solid Waste Disposal Act.

Thank you for your attention to this matter. Should you have any questions, please contact the IHW Registration Team at (512) 239-6413.

Sincerely,

IHW Registration Team
Registration and Reporting Section
Permitting & Remediation Support Division

Received
MAY 02 2006
Remedia...
Cor...

Enclosures

cc: Region Office 04